

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ESTATE OF DORIS M. PEARLMAN; HEIDI  
PEARLMAN AND JILL BETH PEARLMAN, in  
their capacity as the Personal Representatives of the  
Estate of Doris M. Pearlman, in their capacity as co-  
trustees of the Doris M. Pearlman Revocable Trust,  
and as subsequent beneficiaries; DORIS M.  
PEARLMAN REVOCABLE TRUST, as a subsequent  
beneficiary; and MARVIN A. GOLDENBERG, as a  
subsequent beneficiary,

Defendants.

Adv. Pro. No. 10-04504 (SMB)

**STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION**

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted  
pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation

Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including March 28, 2017.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

*[Remainder of page intentionally left blank.]*

Dated: March 1, 2017  
New York, New York

/s/ Nicholas J. Cremona

**BAKER & HOSTETLER LLP**

45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com  
Dean D. Hunt  
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Estate of Bernard L. Madoff*

/s/ Richard Kirby

**BAKER & MCKENZIE LLP**

815 Connecticut Ave, N.W.  
Washington, DC 20006  
Telephone: (202) 452-7020  
Facsimile: (202) 452-7074  
Richard Kirby  
Email: richard.kirby@bakermckenzie.com  
Laura Clinton  
Email: laura.clinton@bakermckenzie.com

*Attorneys for Defendants*

/s/ Richard J. Davis

**RICHARD J. DAVIS, ATTORNEY AT  
LAW**

415 Madison Avenue  
11th Floor  
New York, NY 10017  
Richard J. Davis  
Telephone: (646) 553-1365  
E-mail: richard.davis@rjdavislaw.com

*Mediator*